

5. Defendant Starstone National Insurance Company is a company incorporated in the State of Delaware with its principal place of business in the State of New Jersey.

6. Defendant asserts that complete diversity exists, as Defendant Catlin Specialty Insurance Company is incorporated in Delaware with its principal place of business in Georgia, and Defendant Starstone National Insurance Company is incorporated in Delaware with its principal place of business in New Jersey. Thus, for purposes of diversity, Defendants are citizens of Delaware, Georgia, and New Jersey. See 28 USC §1332(c)(1).

7. This is an action over which this Court has original jurisdiction under the provisions of 28 USC §1332, in that the matter in controversy, exclusive of interests and costs, exceeds the sum of Seventy-Five Thousand Dollars (\$75,000.00), and is between citizens of different states. Plaintiff seeks indemnity and a defense from Defendant Catlin Specialty Insurance Company pursuant to a policy it issued with policy limits of \$1,000,000.00 per occurrence with an aggregate limit of \$2,000,000.00. Plaintiff seeks indemnity and defense from Defendant Starstone National Insurance Company pursuant to an umbrella and/or excess policy it issued with policy limits of \$5,000,000 per occurrence and \$5,000,000.00 aggregate. Thus, this action may be removed to this court by the removing Defendant pursuant to the provisions of 28 U.S.C. §1441.

8. Copies of all processes, pleadings, orders, records, and proceedings in St. Clair County are attached to this Notice of Removal.

9. Defendant has filed this Notice of Removal within thirty (30) days after the service of the Complaint from which it was first ascertained that this case was removable.

WHEREFORE, Defendant, Starstone National Insurance Company, respectfully requests that this Court acknowledge jurisdiction over this action and allow removal to this Court for determination of all issues involved herein.

Respectfully submitted,

**STARSTONE NATIONAL INSURANCE
COMPANY**

By: /s/ Kevin P. Clark
Kevin P. Clark, #06279019
LITCHFIELD CAVO LLP
222 S. Central Avenue, Suite 110
St. Louis, MO 63105
(314) 725-1227 PHONE
(314) 726-3006 FAX
Email: clark@litchfieldcavo.com
Attorneys for Defendant Starstone

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing documents was served via the Court's electronic filing service and sent to all parties of record this 17th day of September, 2018, to:

Michael J. Nester, #02037211
Sean K. Cronin, #6292624
Donovan Rose Nester, P.C.
201 South Illinois Street
Belleville, Illinois 62220
(618) 212-6500 – PHONE
(618) 212-6501 – FAX
mnester@drnpc.com
scronin@drnpc.com
Attorneys for Plaintiff

/s/ Kevin P. Clark